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MEMO ENDORSED

September 27, 2019

VIA ELECTRONIC FILING

Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

The application is granted
 denied

Edgardo Ramos, U.S.D.J
Dated: September 30, 2019
New York, New York

Re: *Frankel, M.D. et al v. U.S. Healthcare, Inc. d/b/a Aetna U.S. Healthcare, Inc. d/b/a Aetna Health, Inc. et al.*
Civil Action No: 1:18-cv-06378-ER-BCM
First Request for Extension of Time to Respond to Complaint-With Consent

Dear Judge Ramos:

This firm represents Defendant Aetna Life Insurance Company, appearing on behalf of improperly pled U.S. Healthcare, Inc. d/b/a Aetna US Healthcare, Inc. d/b/a Aetna Health, Inc. and Aetna, Inc. d/b/a Aetna (collectively, "Aetna") in the above referenced matter.

On September 17, 2019, the Court issued a ruling on Aetna's Motion to Dismiss and, per the Federal Rules of Civil Procedure, Aetna is currently required to respond to the Amended Complaint on or before October 1, 2019. Aetna herein respectfully seeks to extend this deadline until October 15, 2019. In support of this application, Aetna states:

- Plaintiffs' counsel has consented to this extension request;
- This is Aetna's first request with respect to the deadline to respond to the Amended Complaint following the issuance of the Court's ruling on the Motion to Dismiss;
- This extension request is made in advance of Aetna's deadline to respond;
- There are no other deadlines affected by this extension.
- No party will be prejudiced by this extension of time to October 15, 2019.

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A stipulation and proposed Order is submitted herewith. Thank you for your consideration of this matter.

Respectfully yours,

CONNELL FOLEY LLP

s/ Patricia A. Lee

Patricia A. Lee

cc: All Counsel of Record (via ECF)

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